



TO BE FILED UNDER SEAL

October 13, 2020

By Email

Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Kolfage et al. 20 Cr. 412 (AT)
*Non-Parties' Request to File Under Seal a Motion to Modify this Court's
Sealed Order*

Dear Judge Torres:

We represent Kris Kobach, the general counsel of We Build the Wall, Inc. Mr. Kobach, as general counsel, represents We Build the Wall. I am writing to request permission from the Court to file certain documents under seal. In particular, we request permission to submit under seal a motion to modify this Court's April 24, 2020 Post-Indictment Restraining Order (the "Order"), which is itself under seal, and for alternative relief, together with supporting documents. The proposed motion relates to three documents that are already under seal—the Order, the government's application for the Order, and an August 24, 2020 Affidavit of a U.S. Postal Inspector. We respectfully submit that the same justification for filing the Order under seal supports filing this letter, as well as the proposed motion and its supporting documents, under seal. In the event the Court grants our request, we will file the motion and its supporting documents as soon as practicable and hopefully within hours. I have enclosed the proposed sealed filings.

I have communicated with AUSA Robert Sobelman regarding this request, and the government does not intend to submit an opposition to this letter request for permission to file under seal.

GRANTED. Non-parties Kris Kobach and We Build the Wall, Inc. shall file their proposed motion to modify the Order and supporting documents under seal.

SO ORDERED.

Dated: October 13, 2020
New York, New York



ANALISA TORRES
United States District Judge